

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

JEFFREY HARRIS,

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Plaintiff,

*

v.

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Case No. 8:20-cv-00988-GJH

**THE DOW CHEMICAL COMPANY,
et al.,**

*

*

Defendants.

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**THE DOW CHEMICAL COMPANY’S
CONSENT MOTION FOR EXTENSION OF TIME**

Defendant The Dow Chemical Company (“TDCC”), by its undersigned attorney, and with the consent of Plaintiff Jeffrey Harris, moves the Court for an order extending the time within which it must answer or otherwise respond to Plaintiff’s Original Complaint for the following reasons:

1. On May 1, 2020, Plaintiff served copies of the Complaint, Civil Cover Sheet, and Writ of Summons on TDCC’s statutory agent. Absent an extension, TDCC must answer or otherwise respond to the Complaint not later than May 22, 2020.

2. TDCC’s attorney anticipated meeting this deadline. However, on May 20, 2020, he learned of reports that flood waters had breached two dams in Michigan, and were heading toward TDCC’s headquarters in Midland, Michigan.

3. In light of this emergency, TDCC’s attorney asked for Plaintiff’s consent to a two-week extension (that is, until June 5, 2020) to answer or otherwise respond to the Complaint, and gave notice of TDCC’s intent to file this motion. Plaintiff’s attorney kindly agreed to the

requested extension. No counsel has yet entered an appearance for Defendant BP Lubricants USA, Inc. ("BP"), and it would be impracticable to attempt to obtain BP's consent before the May 22 deadline. L.R. 105.9.

4. This motion is timely. Fed. R. Civ. P. 6(b)(1)(A).

WHEREFORE, TDCC, with Plaintiff's consent, moves the Court for an Order extending its deadline to answer or otherwise respond to the Complaint until June 5, 2020.

Date: May 21, 2020

Respectfully submitted,

/s/
Andrew Gendron (Bar No. 5111)
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Attorney for The Dow Chemical Company

It is **so ordered**, this ____ day of May, 2020.

George J. Hazel
United States District Judge

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on this 21st day of May, 2020, the foregoing paper was served via CM/ECF on all counsel of record, and via first-class mail, postage prepaid, on BP Lubricants USA, Inc., c/o The Corporation Trust, 2405 York Road, Suite 201, Timonium, MD 21093-2264.

/s/
Andrew Gendron